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International Association of Fire Chiefs

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24 September 2001

Lake H. Barrett, Acting Director
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
Washington, DC 20580

Dear Mr. Barrett:

The International Association of Fire Chief's (IAFC) has established an official position on the shipment of spent nuclear fuel. We would like to take this opportunity to restate this position.

Prior to any shipment, we believe the following rules, regulations and protocols must be in place:

- Require cask designs able to withstand severe accident scenarios with substantial built-in safety factors. A safe container will assure that no material will leak from a cask involved in a large catastrophic accident. This will protect the responders, citizens and the environment from danger and contamination.
- Require proper marking, labeling, placarding, shipping papers and emergency response information as regulated by U.S. Department of Transportation for rail and highway shipments be in place.
- Require the filing of written route plans to include origin/destination of the shipment, routes, planned stops, estimated arrival, and emergency telephone numbers in each state through which the shipment will traverse.
- Require carriers to use preferred routes for highway shipments—interstate highways, bypasses and beltways. States may propose alternative routes to the interstate highway system. However, fire and emergency response agencies in the potentially affected states and localities must be consulted in designation of alternate routes.
- Require that shippers notify the governor seven days in advance of the material being transported through the state.

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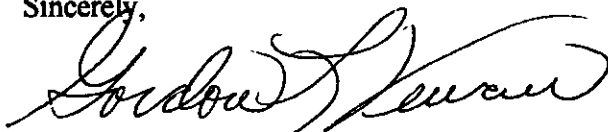
- Recommend that legislation and regulation require governors and their emergency managers to notify the response forces in each jurisdiction through which the shipment will pass. It is critical for local planning purposes that this notification be made.
- Require a tail escort for each shipment. This escort needs to be knowledgeable of radiation, have appropriate equipment and instruments, be uniformed, be knowledgeable of the Incident Command System and be ready to provide intelligence information to the Incident Commander about the condition associated with the radioactive materials involved. After shipments become a routine matter, consideration may be given to eliminating the escort.

From a fire service perspective, the most important element of any plan to transport nuclear waste is firefighter training. Emergency response training must be provided to local agencies along the proposed shipment routes. The federal government should provide this training and be separate from the current OSHA training requirements of first responders to hazardous materials incidents. Training for these first responders must be shipment-specific and there should be no requirement that these responders be qualified as hazardous materials technicians.

When considering the safety of the general population and emergency response personnel, we believe this fuel must be moved to a single, safe site.

We hope these comments are helpful to you and the Department and would be pleased to respond to additional questions. Thank you for the opportunity for the International Association of Fire Chiefs to voice its opinion and concern on the transportation of spent nuclear fuel.

Sincerely,



Chief Gordon L. Veerman
IAFC, Hazardous Materials Committee